

AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. Application No.: 10/678,375

**AMENDMENTS TO THE DRAWINGS**

Submitted herewith is a Replacement Sheet for Figure 3 in which the typographical error in box 104 has been corrected.

The Examiner is respectfully requested to acknowledge these drawings.

Attachment: One (1) Replacement Sheet for Figure 3.

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**REMARKS**

Claims 1-20 are all the claims pending in the application.

**I. Drawings**

The Drawings stand objected to for issues raised in Paragraph 3 of the pending Office Action. With respect to Figure 2, Applicant respectfully submits that the lines connecting the various block elements need not be converted to arrows. Arrows are commonly used to designate direction of flow, as in the flow chart of Figure 3. However, Figure 2 is not a flow chart, but rather a system diagram showing various elements of the system, and the lines depicted indicate the inter-connectivity of the elements. Each line connecting two elements may be a one or two-way connection to enable information flow in either or both directions. Therefore, the lines need not be converted to arrows. Consequently, Applicant respectfully requests the Examiner to withdraw the objection with respect to Figure 2.

A replacement Figure 3 is submitted herewith wherein the typographical error is corrected. Applicant respectfully requests the Examiner to indicate acceptance of replacement Figure 3.

**II. Specification**

The Abstract stands objected to for exceeding 150 words and various language and format issues. A replacement Abstract is submitted herewith. Applicant respectfully requests the Examiner to indicate acceptance of the replacement Abstract.

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### **III. Claims Objections**

Claims 3-9 and 12-18 stand objected to for various informalities. The claims have been amended per the Examiner's suggestions.

### **IV. Claims Rejections**

Claims 1-20 stand rejected as being anticipated by U.S. Application 20020156757 to Brown. Applicant respectfully traverses this rejection at least for the following reasons.

Preliminary, Applicant note that Brown addresses the problem of the difficulty in obtaining and comparing information about products available from various vendors (e.g., Paragraph 0008). Brown therefore discloses a system that enables a designer to review and compare specifications or products and components available from various vendors (e.g., P 0047). The information may include information on the material, model, design rule, etc. (e.g., P 0047). The designer may then review and compare components available from various vendors, may contact them via the software, and make a decision as to which component to use and from whom to OEM the component.

On the other hand, the claimed invention addresses the problem of integrated circuit design. Notably, the claimed invention enables a designer to shortcut the design process by, instead of designing the entire circuit of the entire product, choosing functional circuit modules that can be interconnected to generate the complete circuit design. This is a very different invention than what is disclosed by Brown.

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Turning to the claims language, it is first noted that during patent examination, the pending claims must be "given [their] broadest reasonable interpretation consistent with the specification." *In re Hyatt*, 211 F.3d 1367, 1372, 54 USPQ2d 1664, 1667 (Fed. Cir. 2000), quoted in MPEP Paragraph 2111. Additionally, the broadest reasonable interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach. *In re Cortright*, 165 F.3d 1353, 1359, 49 USPQ2d 1464, 1468 (Fed. Cir. 1999), cited in MPEP Paragraph 2111. Applicant respectfully submit that when the claim terms are given their broadest reasonable interpretation consistent with the specification and with the interpretation what those skilled in the art would reach, the pending claims are not anticipated by, and are patentable over Brown.

With respect to claim 1, it is alleged that Brown teaches a modularized circuit design information generating tool in the Abstract. Applicant respectfully disagrees. Applicant respectfully submits that, properly construed, "circuit design" refers to integrated circuit design and "modularized circuit design" refers to modular design of integrated circuit. Such interpretation is consistent with the specification and the interpretation those skilled in the art would reach. On the other hand, Brown does not refer to integrated circuit design and, specifically not to modularized design of integrated circuit.

It is further alleged that Brown discloses the limitations "functional modules of at least two categories, wherein at least one category of said functional modules includes design information of circuit modules of at least two different specifications." Figure 1 and paragraphs 0046 and 0047 are cited as disclosing these limitations. Applicant respectfully disagrees.

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Applicant respectfully submits that properly construed, these limitations refer to integrated circuits that form functional modules that can be interconnected to form part of the total integrated circuit. No such teaching can be found in the cited Figure and passages. Rather, all that Brown discloses is a workstation that is connectable to a network to enable access to vendor databases, the vendor databases storing data relating to various products available from that vendor. No mention is made by Brown that functional integrated circuit modules can be made available to the user to form a functioning integrated circuit.

It is further alleged that the claim limitation “a circuit module connection means to define connections between or among selected circuit modules” is disclosed in Paragraph 0090 of Brown. Applicant respectfully disagrees. As properly construed, this limitation requires defining connections among the various integrated circuit modules so as to form a functioning integrated circuit. To clarify this feature, claim 1 has been amended to also recite the phrase: “thereby provides a circuit design of a working integrated circuit comprising said selected circuit modules.” No such limitation is even remotely suggested in Paragraph 0090 of Brown. Rather, in Paragraph 0090 of Brown it is only stated that the design file may be reviewed using a CAD design software. There is not even a hint in Brown for a circuit module connection mean to define the connection between the integrated circuit modules.

At least for these reasons, Applicant respectfully submit that claim 1 is allowable over Brown. Additionally, Applicant respectfully submit that claims 2-9 are allowable by definition for their dependency on allowable claim 1.

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With respect to claim 10, Applicant notes that the Examiner did not specifically address how Brown teaches the limitations of claim 10. Claim 10 is a method claim that follows the inventive steps of constructing a working integrated circuit by selecting functioning circuit modules and defining connections among these modules. As with claim 1, Applicant respectfully submit that Brown fails to disclose such a method. Accordingly, Applicant respectfully submits that claim 10 is allowable. Additionally, Applicant respectfully submit that claims 11-20 are allowable by definition for their dependency on allowable claim 10.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

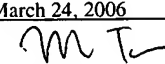
Respectfully submitted,

  
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Joseph Bach  
Registration No. 37,771

SUGHRUE MION, PLLC  
Telephone: (650) 625-8100  
Facsimile: (650) 625-8110

MOUNTAIN VIEW OFFICE  
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